

Matthew L. Rollin (SBN 332631)  
Joel B. Rothman (*Pro Hac Vice*)  
**SRIPLAW, P.A.**  
8730 Wilshire Boulevard  
Suite 350  
Beverly Hills, California 90211  
323.452.5600 – Telephone  
561.404.4353 – Facsimile  
[matthew.rollin@sriplaw.com](mailto:matthew.rollin@sriplaw.com)  
[joel.rothman@sriplaw.com](mailto:joel.rothman@sriplaw.com)

Attorneys for Plaintiff  
VIRAL DRM LLC

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

VIRAL DRM LLC,

Plaintiff,

v.

THE YOUTUBE UPLOADERS LISTED ON  
SCHEDULE A

Defendant.

Case No.: 3:23-cv-04300-JSC

**PLAINTIFF'S NOTICE OF MOTION FOR  
DEFAULT JUDGMENT**

The Honorable Jacqueline Scott Corley

Date: January 18, 2024

Time: 10:00 a.m.

Courtroom: Courtroom 8

**TO THE HONORABLE COURT, ALL PARTIES AND THEIR RESPECTIVE COUNSEL  
OF RECORD:**

PLEASE TAKE NOTICE that Plaintiff VIRAL DRM LLC (“Plaintiff”), by and through its attorneys, hereby moves for an application for entry of default judgment against Defendant The YouTube Uploaders Listed on Schedule A (“Defendants”). This motion is scheduled on January 18, 2024 at 10:00 a.m. before the Honorable Jacqueline Scott Corley, in the San Francisco Courthouse, Courtroom 8, 19th Floor, at 450 Golden Gate Avenue, San Francisco, California 94102.

Plaintiff seeks entry of default judgment for Plaintiff's claims of copyright infringement against Defendant, an award of damages pursuant to 17 U.S.C. § 504, an award of damages

1 pursuant to 17 U.S.C. § 1203, an award of Plaintiff's costs and reasonable attorneys' fees pursuant  
2 to 17 U.S.C. § 505 and an injunction pursuant to 17 U.S.C. § 502 permanently enjoining Defendant  
3 from further infringement.  
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5 DATED: December 13, 2023

Respectfully submitted,

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7 /s/ Matthew L. Rollin

MATTHEW L. ROLLIN

8 JOEL B. ROTHMAN

**SRIPLAW, P.A.**

9 Attorneys for Plaintiff Viral DRM LLC  
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